

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
James C. Jacobs	:	Chapter 13
	:	Case No. 22-11836-ELF
Debtor(s)	:	

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY US BANK TRUST NATIONAL ASSOCIATION

Debtor, James C. Jacobs, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by US Bank Trust National Association, hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted payments were missed. Debtor asks for the chance to catch up.
7. Admitted payments were missed. Debtor asks for the chance to catch up.
8. Denied.
9. No response required.

WHEREFORE, Debtor, by and through the undersigned counsel, respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

/s/ Brad J. Sadek, Esq.

Dated: October 28, 2022

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1500 JFK Boulevard Suite #220
Philadelphia, PA 19102
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Denise Carlon, Esq.
Attorney for Movant *Specialized Loan Servicing, LLC*
Electronic Notice to bkgroup@kmlawgroup.com

Dated: October 28, 2022

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor(s)